

UNITED STATES AGENCY FOR INTERNATIONAL DEVELOPMENT

BUREAU FOR HUMANITARIAN RESPONSE  
OFFICE OF FOOD FOR PEACE  
DEVELOPMENT PROGRAMS TEAM

**F I N A L**

**P.L. 480 TITLE II GUIDELINES  
for  
COOPERATING SPONSOR  
RESULTS REPORTS AND RESOURCE REQUESTS (CSR4)**

October 30, 2001

## **LIST OF ACRONYMS**

ADS - Automated Directives System  
AER - Annual Estimate of Requirements  
BEO – Bureau Environmental Officer  
BHR - Bureau for Humanitarian Response  
BNT – Bags, Needles & Twine  
CBO – Country Backstop Officer  
C&F - Commodity and Freight  
CFR - Code of Federal Regulations  
CBJ – Congressional Budget Justification  
CS - Cooperating Sponsor  
CSR4 – Cooperating Sponsor Results Report and Resource Request  
DAP - Development Activity Program  
EDM - Environmental Documentation Manual  
ESR - Environmental Status Report  
FAS - Free Alongside Ship  
FFP - Office of Food for Peace  
FFPIS - Food for Peace Information System  
FY - Fiscal Year  
HQ - Headquarters  
IEE - Initial Environmental Examination  
LDC/LIFDC – Least Developed Country/Low Income Food Deficit Country  
LOA - Life of Activity  
MT - Metric Ton  
NICRA - Negotiated Indirect Cost Rate Agreement  
PAA - Previously Approved Activity  
P.L. - Public Law  
R4 - Results Review and Resource Request (USAID office submission)  
REDSO – Regional Economic Development Support Office  
REO - Regional Environmental Officer  
TA – Transfer Authorization  
US – United States  
USAID - United States Agency for International Development (AID)

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Note: If this is an electronic version of this document, note that font changes or margin parameters may affect pagination.

## **I. INTRODUCTION TO GUIDELINES**

The following guidance is being prepared in draft for incorporation into the United States Agency for International Development (USAID)'s Automated Directives System (ADS) where it will be available on-line for USAID and Cooperating Sponsor (CS) reference under USAID Program and Project Assistance, Food Aid Assistance Obligation, Annual Cooperating Sponsor Results Report and Resource Requests (CSR4) (Section 252.5.B).

### **A. Purpose**

The CSR4 process replaces the previous Results Report and Previously Approved Activity (PAA) submissions. The CSR4, besides serving as the Cooperating Sponsor's official "Resource Request" document, provides meaningful results-oriented information to assist Cooperating Sponsors, USAID Missions, and the Bureau of Humanitarian Response(BHR)/ Office of Food for Peace (FFP) in demonstrating the impact of Title II food aid on food security. It also serves as an important information source during preparation of new Development Activity Programs (DAPs); the Mission and FFP Results Review and Resource Requests (R4); and USAID's annual report to Congress. The CS's results report section of the CSR4 is to focus on the food aid activity's performance indicators and progress towards the achievement of results. In addition, commodity needs projections are referred to during the preparation of the FFP's budget request, which feeds into USAID's annual Congressional Budget Justification (CBJ).

### **B. CS Preparation of the CSR4**

A CS must submit a CSR4 to report on each year's activities, and to request funding for the second and any subsequent years of a DAP. In some instances, the results report or the resource request portion of the CSR4 is not applicable. If a CS is in the first year of program implementation and is preparing a resource request for the second year's funding, the corresponding results report section of the CSR4 covers the final year of the previous DAP. However the results report section is neither applicable nor required where the current DAP is not a consecutive Title II program for that CS in that country. If a CS is in the final year of program implementation and is preparing a "follow-on" DAP proposal, the results report is required for reporting on the next-to-final year of the program, and the resource request section of the CSR4 is neither applicable nor required.

FFP recognizes that there may be changes in implementation arrangements, which may require a substantive review of the foundations upon which the program was originally approved. For example, a radical change in monetization arrangements, timeframe over which program activities would be carried out due to implementation delays as a result of late start-up or external political or climatic events). Under these circumstances the CS and FFP may mutually decide to consider a program revision. CSs are encouraged to consult early with FFP Country Backstop Officers (CBOs) to make this determination.

However, Public Law 480 requires multi-year programs and DAPs are thus reviewed on that basis, including the objectives and purpose of the DAP. Deviation from those objectives and purposes are presumptively unnecessary. In addition, a CS should not propose a significant

change to a previously approved program, such as, a) an increase in the total life-of-activity (LOA) resource request based upon the local currency and 202(e) LOA monetization budgets and/or the direct distribution commodity requirements; and/or b) a cumulative change of 10% or more into or between priority sectors (health/nutrition and agriculture) of the comprehensive LOA monetization budget or direct distribution commodity tonnage.

For CSs with consolidated country or regional programs, DAP amendments will be required only if resources are requested over the overall life of activity for the total combined program, or dramatic program implementation arrangement changes are proposed, as described above.

For consolidated country programs, the lead CS will have the authority to adjust program levels within the DAP period and between CSs, subject to agreements worked out by the CSs, and funding availability. These changes may be described in the CSR4.

For consolidated regional programs (a single CS with multiple country programs) the CS headquarters (HQ) will have the authority to adjust program levels within the DAP period and between country programs, subject to funding availability. These changes may be described in the CSR4.

### **C. Life of Activity Resource Request**

DAP approvals are explicit as to the LOA resources for commodity and freight funding as well as Section 202(e). The LOA provides the framework for the budgetary controls and program parameters throughout the food aid activity. A CS's adherence to programmatic and budgetary components of their approved DAP proposal, as described by the LOA levels for commodities, local currency, and US Dollar budgets, will facilitate an expeditious review and approval process for their CSR4.

### **D. Submission (Format, Date and Fiscal Years of Reference)**

CSs should submit one hard copy of their CSR4 as well as one electronic copy on diskette (FFP recommends use of the attached format in Appendix A) to the cognizant USAID Mission no later than December 31<sup>st</sup>. CSs should submit five hard copies and one diskette to BHR/FFP no later than January 31<sup>st</sup>.

The results report should report on the most recently completed fiscal year (FY). The resource request should present the following two year's resource requests. It forms the basis of the requested year's resource obligation and provides the following year's budgeting levels, which feed into the Congressional Presentation, which is prepared in January for the fiscal year, two year's following. (e.g., CSR4s due to the Missions on December 31, 2001 include the Results Report for FY 2001 [10/1/2000 – 9/30/2001] and the Resource Request for FY 2003 [10/1/2002 – 9/30/2003] as well as estimated request levels for FY 2004 [10/1/2003 – 9/30/2004]. Requests should cover both commodity and 202(e) funding needs, and include a comprehensive budget.

## **E. Submission Length and Presentation Format**

The CSR4 should be concise. Following the recommended format in **Annex A**, the CSR4 should total no more than 30 pages, including up to 12 pages for the results report, and up to 14 pages for the resource request. No more than three pages should cover monetization, and only one page should cover environment compliance. Budget, AER and other essential appendices may be additional (e.g., revised Bellmon analyses, evaluations, etc., if required).

All CSR4 submissions must be:

- written in 12-point type (narrative) in English, paginated, with a date on each page
- prepared in MS Word '97 (text) and Excel (spreadsheets)

Include only the information requested (state if a section is not applicable). The only appendices that should be attached are those required by these Guidelines. Repetition of narrative information already presented in the relevant approved DAP is unnecessary. Reference should be made to any sections of a DAP or previous Results Report which are relevant to an issue or point being addressed in the CSR4 (include page number and/or section references).

## **F. Review Process**

USAID Missions are responsible for the initial review of the CS's R4. Missions are required to comment, via cable, on the Cooperating Sponsor's R4 by March 1st, to FFP. Mission review and cable instructions are issued separately. For programs operating in countries without a USAID presence, the CS should contact FFP for information regarding which Mission in the region will have cognizance over the proposed activity. Where a USAID Mission has CSR4 resource request approval authority, the USAID Mission coordinates the CSR4 resource request process.

FFP conducts a completeness check on CSR4's, obtains USAID Mission comments, and reviews the documents against the presented criteria. Normally, funding is available at the level approved for that FY in the original approved DAP, or subsequent DAP Amendment. CSR4 resource requests which require funding above the previously approved annual level are considered on a case by case basis, based on funding availability and program priorities. Note, however, that LOA levels may not be exceeded. CS meetings will be held on an as needed basis. Transfer Authorization (TA) modifications are issued by FFP or, in the case of Missions where CSR4 approval is delegated, by the USAID Mission.

## **II. RESULTS REPORTS**

### **A. Annual Results**

CSs are asked to briefly discuss progress to date or results achieved over the LOA with particular emphasis on results obtained during the most recently completed fiscal year. In an indicator performance tracking table, they should also present anticipated results for future fiscal years against strategic objectives and intermediate results in terms of the approved performance indicators.

Where possible, CS' are asked to include brief narrative examples of success stories or people-level impacts that can be used for reporting program successes to a wider audience.

A good performance assessment will: 1) describe progress over the past year relative to planned results as reflected by the objective and intermediate result indicators, baselines and targets; 2) state explicitly whether progress met, exceeded or fell short of expectations toward achievement of the objective; 3) interpret significant trends and highlight differences between planned and actual performance; 4) identify reasons for performance shortfalls or greater than expected results; and, 5) document any proposed revisions in out-year targets based on performance to date; and 6) describe CS actions taken to respond to recommendations from FFP or the Mission in previous year approval documentation. Out-year targets should be revised upward when prior year targets have been consistently exceeded. A downward revision of an out-year target requires a full explanation and FFP approval. In cases where up-to-date performance indicator data are not available because of the timing of data collection, provide other evidence of progress toward achieving targets.

This part of the report should also list evaluations and the dates submitted to USAID; information on key evaluation findings and what the CS has done to address them; customer (participant/beneficiary) feedback results; or other evidence of progress toward achievement of targets that support a balanced assessment of progress for each objective.

Some examples of key questions to consider are as follows:

- What circumstances led to exceeding or falling short of expected targets? Were targets too high or too low? If so, why?
- Have key assumptions changed?
- How did customer (participant/beneficiary) feedback influence the CS's thinking on accomplishing the objective? Did this feedback confirm the program is on track, or are there issues which must be addressed?
- How has program management been influenced by inter-sectoral partnering (among non-governmental organizations and governmental actors), and changes in the institutional and policy framework (which was carried out to stimulate community initiative)?
- What is the significance of what is being accomplished (e.g., what is the food security impact of improved water and sanitation infrastructure, service and practices for the affected 1000 households and the region or country as a whole)?

## **B. Monitoring & Evaluation, Audits and Studies**

CSs are asked to provide an update on their monitoring and evaluation system and describe the follow-up to any audits, evaluations or studies. Copies of baseline survey results and evaluations conducted during the year are asked to be attached.

### **C. Expenditure Report**

CSs are asked to provide a report of actual expenditures over the FY.

### **D. Monetization Sales**

This section fulfills the requirements of Regulation 11 that CSs submit an annual report on monetization and program income activities. A separate annual monetization and program income report is not necessary, as, pursuant to the authority granted him in 22 Code of Federal Regulations (CFR) 211.12 (Regulation 11), the Acting Assistant Administrator/BHR is waiving the following sentence in 22 CFR 211.5(l), *"This annual report should be submitted to AID/W[ashington] by December 31 of each calendar year for the fiscal year ending September 30 of that calendar year."* to the extent that it conflicts with this guidance with regard to the timing of reports.

#### **1. Analysis of Monetization Transaction(s)**

CSs are requested to provide a detailed analysis of the monetization transaction(s) that the CS was party to during FY. A worksheet is provided within the CSR4 format which includes: key information regarding each commodity sale, to allow a comparison of the actual sales price to the cost recovery benchmark, as well as against the actual full cost of the monetization sale (commodity, shipping & transaction costs).

The applicable Cost Recovery Benchmark is defined, as follows, in the final version of the Monetization Field Manual Implementation Guidelines Section I.C. *"80% of the C&F value, using the FAS quotation provided by FFP at the time of the call forward, the foreign flag rate, plus port clearing and handling costs and duties, estimated transport costs to move the commodity to the point of sale, and expenses associated with marketing the commodity, or 100% of FAS, whichever is greater."*

#### **2. Monetization Results**

CSs are asked to report on how the value of proceeds was maximized, as well as the impacts of the monetization transaction(s) in terms of anticipated and unanticipated effects on local, regional or national production, and marketing of the monetized commodity or its substitutes. The food security impact of the monetization transaction itself is also sought.

## **III. RESOURCE REQUEST**

### **A. Where Approval Authority is Delegated to USAID/Missions**

Where a USAID Mission has CSR4 approval authority, the same general Guidelines apply.



## **B. CSR4 Submission in Countries without USAID Missions/Regional DAP Submission**

Where no USAID Mission is present in the country, the CSR4 should be submitted by the CS to the designated USAID “twinned” Mission or U.S. country team for review. In West Africa, CSs should simultaneously submit a copy of the CSR4 to the Regional Food for Peace Officer for review. If the country is covered by a REDSO (Regional Economic Development Support Office) or bilateral Mission, the country team is encouraged to incorporate REDSO FFP officers into the review. Following completion of the review, the U.S. diplomatic post's country team (e.g., Chief of Mission and department heads, economic-commercial, political, and agricultural attachés) will provide comments to BHR/FFP. The CS should contact BHR/FFP if it has questions regarding submission.

If the CS is reporting on a regional program, the CSR4 would be submitted to all applicable USAID Missions and field units for review and submission of comments to BHR/FFP.

## **C. Resource Request Review Criteria**

Annual funding will be subject to the availability of funds and commodities. A critical factor in the approval of a resource request is the assessment that adequate progress is being made towards achieving results as reported in the CSR4 (e.g., progress as planned or as is reasonable in the given circumstances).

### **1. Technical Review Criteria**

The following criteria apply to all Title II Results Report and Resource Requests:

#### **a. Successful Program Implementation**

Adequate progress is being made towards achieving results as reported in the CS's Results Report section covering the previous FY. There are no changes to the program.

#### **b. Responsiveness to Concerns and Recommendations**

The CS has complied with all requirements and addressed previously raised concerns and recommendations that have been identified in that FY's approval documentation, the previous year's Results Report reviews, evaluations, or other sources.

#### **c. Financial Plan**

The financial plan for the FY, including monetization and/or Section 202(e) funding pipeline analysis, is deemed reasonable by the USAID Mission and BHR/FFP. For Title II programs with monetization components, the CS has satisfactorily met financial and management capacity certification requirements as determined by the USAID Mission.

d. AER Analysis

The FY's Annual Estimate of Requirements (AER) is correctly calculated, consistent with other commodity usage documents, and does not exceed the commodity resource requirements (line 8) approved for the fiscal year in the original DAP. Any deviations from the previously approved levels for the fiscal year must be justified. In addition, the CS has submitted a 12-month procurement plan for the fiscal year for requested commodities.

e. Mission Concurrence

The USAID Mission, diplomatic post, "twinning" USAID Mission, and/or Regional Food for Peace Officer (or other structure, as appropriate) have concurred with the continuance of the program, having reviewed it in accordance with the above criteria, and has provided comments.

f. Environmental Compliance

Updating of environmental compliance documentation requirements, as appropriate, has been completed.

2. Resource Request Approval Criteria

Resource Requests will be approved based on the above criteria, subject to commodity and funding availability.

**D. Resource Request Format**

CSs are asked to submit a program summary and information regarding their activity resource requirements for the fiscal year, both financial and commodity levels. Use of FFP's CSR4 suggested format is recommended. (See Annex A)

**E. Environmental Compliance Statement or Documentation**

If the Initial Environmental Examination (IEE) of the original DAP proposal was cleared without conditions or a categorical exclusion was granted, the CS should only submit a signed Environmental Status Report (ESR) face sheet.

In all other situations, the CS should include as an appendix to the CSR4, an ESR detailing the actions they have undertaken with regards to the previously approved IEE. The ESR should indicate whether mitigation plans are on schedule and detail the monitoring and evaluation measures being undertaken by the Cooperating Sponsor. The ESR face sheet must be signed by either the Mission Environmental Officer or the Food for Peace Officer.

For those Cooperating Sponsors who received a prior year deferral on one or more aspects of their program from the BHR Bureau Environmental Officer, an amended IEE should be included

with their resource request to resolve each deferral or indicate that the activity will not be conducted, if that is the case.

See **Annex B** or the Environmental Documentation Manual for further details.

## **ANNEX B**

### **Environmental Review and Compliance Information**

#### **I. Background on Regulation 16**

USAID's Environmental Procedures (known as 22 CFR 216 or Reg. 16) are meant to ensure that (1) the environmental consequences of USAID-funded activities are identified during the design stage, and that these consequences are considered prior to funding approvals and a decision to proceed with activity implementation; and (2) if possible, activities are identified that preserve or restore the natural resource base where the activity is located.

#### **II. Title II Compliance with Regulation 16**

Compliance with USAID's Environmental Procedures (known as 22 CFR 16 or Reg. 16) is required of all Title II development activities, whether they are supported by food assistance or Section 202(e) funding. All Title II Development Activity Program proposals should include an Initial Environmental Examination (IEE) with their proposal. If the IEE of the original DAP was cleared without conditions or a categorical exclusion was granted, the CS should only state "No changes" in the Environmental Compliance section of the CSR4 submission.

In all other situations, the CS should include, as an appendix to the CSR4, an Environmental Status Report (ESR) detailing the actions they have undertaken with regards to the previously approved IEE. The ESR should indicate whether mitigation plans are on schedule and detail the monitoring and evaluation measures being undertaken by the Cooperating Sponsor. The ESR face sheet must be signed by either the Mission Environmental Officer or the Food for Peace Officer. should include an Environmental Status Report detailing the actions they have undertaken with regards to their previously approved IEE. This status report may be between 2-10 pages and should indicate if mitigation plans are on schedule and should detail the monitoring and evaluation measures being carried out by the Cooperating Sponsor. However, if a CS's FY 2002 submission contains changes that require a DAP amendment, an IEE amendment may need to be submitted with the DAP amendment. Please see sections A through D below for further details.

Cooperating Sponsors are encouraged to seek Mission review and clearance on DAP IEEs prior to official submission of the proposal to FFP/Washington. The same is true for CSR4 ESRs and IEE amendments for CSR4s or DAP amendments. Environmental documentation, marked draft, may be submitted informally through the Mission to the Bureau Environmental Officer. If environmental documentation is submitted with the DAP proposal, DAP amendment or R4 without having been cleared by the Mission, the CS should insure that it is clearly labeled as "draft -- not cleared by Mission." All draft Reg. 16 documentation must be returned to the Mission for required clearance and the Mission may request revisions to ensure that Mission objectives, consideration of local conditions and consistency with environmental documentation of other Sponsors in the same country is achieved.

#### A. New DAPs

To meet this requirement, all DAPs must include an IEE, which must be cleared by the Mission Director or his/her designate. A statement as to whether the Mission concurs/does not concur with the CS's ESR (if applicable) should be included in the Mission's approval/comments cable to FFP. The CS is expected to submit the cleared document with their DAP to FFP for clearance. FFP will obtain clearance from the FFP Director and forward the IEE to the BHR Bureau Environmental Officer (BEO) for final concurrence. Note however, that if CSs and Missions are interested in getting feedback from the BHR, Geographic BEOs or a Regional Environmental Officer (REO) on a draft IEE prior to formal submission, they are encouraged to submit a copy for informal review to one or both BEOs or to the REO, where they exist. An IEE face sheet should accompany the IEE.

#### **B. DAP Amendments**

All DAP amendments must include an IEE amendment if a change has occurred from what was submitted in the original IEE. The same clearance process is followed as described above for DAPs. If no change has occurred, the process as described below for CSR4s should be followed.

#### C. CSR4 Submission

If the IEE of the proposal was cleared without conditions or a categorical exclusion was granted, the CS should only state "No changes" in the Environmental Compliance section of the CSR4.

In all other situations, the CS should include an Environmental Status Report as an appendix to the CSR4, detailing the actions they have undertaken or that need to be taken with regard to the previously approved IEE or Environmental Assessment /Programmatic Environmental Assistance where they might exist. In 2-10 pages, the ESR should indicate whether steps need to be taken to modify previous environmental documentation and whether conditions are being met (e.g., mitigation plans are on schedule and monitoring and evaluation measures are being undertaken by the Cooperating Sponsor). The CSs should include a matrix, or chart, in the ESR outlining that mitigation plans are being implemented as submitted in previous environmental documentation, (i.e. the IEE). An ESR face sheet is used for IEE amendments.

#### D. Deferrals

For those Cooperating Sponsors who received an FY 2001 deferral on one or more aspects of their program from the BHR Bureau Environmental Officer an amended IEE should be included with their following year's CSR4 to resolve each deferral or indicate that the activity will not be conducted, if that is the case.

### III. IEE Preparation Resources

While these guidelines take precedence, The Environmental Documentation Manual also provides guidance on completing the IEE, IEE amendment and Environmental Status Report (ESR). The Manual also covers more in-depth environmental reviews, and defines many of the environmental compliance issues and terms used in these instructions. A Field Guide to USAID Environmental Compliance Procedures is a shorter field guide. In addition to these documents, both the Mission and Bureau Environmental Officers, and where they exist, Regional Environmental Officers, should be consulted.

## ANNEX C

### Commonly Used Value-Added \* Commodities

(\*Determined to be Processed, Fortified or Bagged:)

Bulgur	Wheat Hard Red Winter, Bagged
Corn, Bagged	Wheat Soft White, Bagged
Cornmeal	Wheat Hard Durum with BNT
Corn Soy Blend	Wheat Soft Red Winter with BNT
Instant Corn Soy Milk	Wheat Hard Red Winter with BNT
Corn Soy Milk	Wheat Soft White with BNT
Sorghum, Bagged	Beans, Navy
Nonfat Dried Milk	Corn Soy Masa Flour
Rice, Bagged	Beans, Black
Rice, Bulk with BNT	Beans, Great Northern
Soy Fortified Bulgur	Beans, Pink
Soy Fortified Rolled Oats	Beans, Kidney
Soy Fortified Sorghum Grits	Peas, Green Split
Vegetable Oil 4L	Peas, Yellow Split
Wheat Flour	Potato Flakes
Wheat Soy Blend	Infant Formula
Beans, Pinto	Whole Dry Milk
Peas, Green	
Vegetable Oil 20L	
Peas, Yellow	
Butter	
Cheese	
Wheat Soy Milk	
Lentils	
Beans, Red	
Fortified Non-Fat Dry Milk	
Butteroil 55 gal Drum	
Corn, Bulk with BNT	
Wheat Hard Durum, Bagged	
Wheat Soft Red Winter, Bagged	
Wheat Northern Spring Dark, Bagged	

BNT = Bags, Needles & Twine

## **Annex D**

### **Supplemental Information List**

#### **1. Legislation and Policy**

- Regulation 11 and Public Law 480 (as amended through Public Law 104-130, April 9, 1996) \*
- Food Aid and Food Security Policy Paper, 1995 \*
- List of LDC/LIFDC Countries, 2000 \*
- Annual FFP Policy Letter (September, 2001) \*

#### **2. Commodity and Monetization Documents**

- P.L. 480 Title II Monetization Field Manual, November 1999 \*
- Background Paper and Guide to Addressing Bellmon Amendment Concerns on Potential Food Aid Disincentives and Storage\*
- Commodity Reference Guide \*
- Bellmon Certification Requirements for P.L. 480 Title II Activities - cable: STATE 086386

#### **3. Monitoring and Evaluation and Program Reporting Reference Materials**

- Cooperating Sponsor Results Report & Resource Request Guidelines \*
- FANTA Indicator & Evaluation Guides \*
- Performance Indicators for Food Security (published by CDIE)

#### **4. Environmental Compliance Information for Title II Programs**

- Environmental Documentation Manual (October, 1999)
- A Field Guide to USAID Environmental Compliance Procedures (March 5, 1999)

#### **5. P.L. 480 Title II : Close-out Plan Guidance \***

#### **6. FFP Communications to USAID Missions Regarding Title II Development Programs**

- Mission Instructions on the Review of Title II FY 2003 Cycle CSR4s, DAPs, and DAP Amendments (cable)
- Checklist for Mission Management of Title II Programs (with examples) \*
- Memorandum of Understanding for “Delegated” Missions (sample)
- Enhanced Mission Authority over Title II Programs in Selected Countries (cable)

Note: Starred (\*) documents are available directly or via links at [http://www.usaid.gov/hum\\_response/ffp](http://www.usaid.gov/hum_response/ffp). Other documents are available upon request from FFP (email: [rinenberg@usaid.gov](mailto:rinenberg@usaid.gov)).